

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

KOHCHISE JACKSON,

Plaintiff,

v.

CHS TX, INC., et al.,

Defendants.

Case No.: 2:19-cv-13382-GAD-PTM

U.S. DISTRICT COURT JUDGE  
HON. GERSHWIN A. DRAIN

**NOTICE OF FILING DEFENDANTS PROPOSED VERDICT FORM**

Defendants CHS TX, Inc. and Keith Papendick, M.D. (collectively “Defendants”), file the attached verdict form for use at trial.

In submitting this proposed verdict form, Defendants do not waive their objections to specific claims or damages and reserve the right to modify this verdict form based on the evidence at trial and the Court’s rulings. In particular, Defendants reserve the right to request the jury be given separate questions as to specific questions related to the basis for punitive damages once the evidence has been presented.

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**[PROPOSED] JURY VERDICT FORM**

We, the jury, return the following verdict:

1. Did Plaintiff prove by a preponderance of the evidence that Dr. Keith Papendick was deliberately indifferent to Plaintiff's serious medical needs?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If you answer to Question 1 is NO, you have reached a verdict. DO NOT answer the remaining questions. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If your answer is YES, proceed to Question 2.***

2. Did Plaintiff prove by a preponderance of the evidence that Dr. Papendick's deliberate indifference caused him to be denied care for his serious medical needs?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If you answer to Question 2 is NO, you have reached a verdict. DO NOT answer the remaining questions. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If your answer is YES, proceed to Question 3.***

3. Did Plaintiff prove by a preponderance of the evidence that Dr. Papendick was the final decision maker relating to Plaintiff's colostomy care while in the Michigan Department of Corrections?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If you answer to Question 3 is NO, you have reached a verdict. DO NOT answer the remaining questions. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If your answer is YES, proceed to Question 4.***

4. What amount of compensatory damages did Plaintiff prove was caused by Dr. Papendick's deliberate indifference to his serious medical needs?

\$ \_\_\_\_\_

***If you find Plaintiff has proven compensatory damages as to Dr. Papendick, you must award at least one dollar.***

***Proceed to Question 5.***

5. Did Plaintiff prove by a preponderance of the evidence that Corizon Health, Inc. had a permanent and well settled illegal policy, practice, or custom that was deliberately indifferent to Plaintiff's serious medical needs?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If your answer to Question 5, is NO, you have reached a verdict. DO NOT answer the remaining questions. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If your answer is YES, proceed to Question 6.***

6. Did Plaintiff prove by a preponderance of the evidence that Corizon Health, Inc.'s illegal policy, practice, or custom was the moving force behind a denial of care for Plaintiff's serious medical needs?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If your answer to Question 6, is NO, you have reached a verdict. DO NOT answer the remaining questions. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If your answer is YES, proceed to Question 7.***

7. What amount of compensatory damages did Plaintiff prove was caused by Corizon Health Inc.'s illegal policy, practice, or custom?

\$ \_\_\_\_\_

***If you find Plaintiff has proven compensatory damages as to Corizon Health Inc., you must award at least one dollar.***

***You have reached a verdict. Sign the verdict form and inform the court officer that you have reached a verdict.***

SO SAY WE ALL, this \_\_\_\_\_ day of August \_\_\_, 2025.

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FOREPERSON

**PUNITIVE DAMAGES**

1. Did Plaintiff prove by a preponderance of the evidence that Dr. Papendick is liable for punitive damages?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If your answer to Question 1 is NO, you have reached a verdict. DO NOT answer the remaining questions. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If you answer to Question 1 is YES, proceed to question 2.***

2. What is the amount of punitive damages that you assign to Dr. Papendick?

\$ \_\_\_\_\_

***Proceed to Question 3.***

3. Did Plaintiff prove by a preponderance of the evidence that CHS TX, Inc. is liable for punitive damages?

YES \_\_\_\_\_ NO \_\_\_\_\_

***If your answer to Question 3 is NO, you have reached a verdict. DO NOT answer the remaining question. Sign the verdict form and inform the court officer that you have reached a verdict.***

***If you answer to Question 1 is YES, proceed to question 4.***

4. What is the amount of punitive damages that you assign to CHS TX, Inc.?

\$ \_\_\_\_\_

*If you entered an amount of damages in Question 3, then please answer Question 4.*

SO SAY WE ALL, this \_\_\_\_\_ day of August \_\_\_, 2025.

\_\_\_\_\_  
FOREPERSON